

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SEAN COMBS,

Defendant.

24-cr-542 (AS)

DECLARATION OF TENY GERAGOS KRISHNASWAMY

I, Teny Rose Geragos Krishnaswamy, declare as follows:

1. I am a partner at Agnifilo Intrater LLP, counsel for Sean Combs. I am licensed and in good standing to practice law in the States of New York and California and I am also admitted to the United States District Court for the Southern District of New York.

2. The declaration is based on my personal knowledge of the facts stated herein, and is submitted in support of Mr. Combs's Motion in Limine to Exclude Rule 404(b) Evidence.

3. Attached hereto as **Exhibit 1** is 3500 material pertaining to [REDACTED], marked as 3566-015.

4. Attached hereto as **Exhibit 2** is 3500 material pertaining to [REDACTED], marked as 3534-001.

5. Attached hereto as **Exhibit 3** are excerpts of [REDACTED] testimony and [REDACTED] in *People v. Barrow, et al.*, Ind. No. 9918/99 (N.Y. Sup., N.Y. Cnty.).

6. Attached hereto as **Exhibit 4** is 3500 material pertaining to [REDACTED], marked 3584-001.

7. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 2, 2025
New York, NY

/s/ Teny Geragos
Teny Rose Geragos, Esq.